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COMMENTS TO FCC RM-10352

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I am in FAVOR of the FCC accepting RM-10352 as written. This Rule action will provide a heretofore-lacking division of legitimate, but incompatible narrowband and wideband emissions in the Amateur 160-meter band.

By establishing narrow and wide bandwidth "sub-bands" within the authorized 160-meter Amateur band, the FCC will enable and encourage use of spectrally efficient narrowband modes, including state-of-the art digital modes and other modes yet to be developed. It is a sad fact of history that the 160-meter band was not afforded the same sub-band spectrum plan that the FCC has applied to all other Amateur bands below UHF. For decades, use of the 160-meter Amateur band has come with a degree of mutual interference and a significant level of resulting stress. Increasingly, the lack of division between narrowband and wideband emissions has led to serious disputes amongst 160-meter band operators due to inter-modal interference. Recently, these disputes have escalated to such intense levels that the Commission has had to become involved and devote its staff resources to the problems.

The inter-modal interference problem in the Amateur 160-meter band is much akin to the interference experienced by Public Safety Communications from spectrally incompatible cellular and Commercial Mobile Radio Services in the 800 MHz band. Unfortunately, a clear solution is not at hand for the serious interference problems that exist in the 800 MHz band. In contrast, the Amateur 160-meter interference problem can be mitigated through formalization of a sub-band allocation plan, by affirmative action of the Commission in accepting RM-10352. Now is the time to apply the same sub-band structure to 160-meters as the other Amateur bands below UHF, where ALL other bands have a narrow-mode-only segment.